RE: RM-10620

Dear Commissioners,

After reviewing the original proposal submitted, it difficult to understand why someone with 20 years experience in the amateur service would not have upgraded. This proposal rewards someone with something that they do not want.

The requirement of proof of 20 years of good service adds to the work of the VECs. The 20 years of good service could be nothing more than license renewals.

The Novice frequency expansions are easily obtainable with an upgrade to Technician Class. Without testing the Novice for the Technician Class, the Commission will have no proof of their understanding of the rules and their technical ability.

The Advanced Class part of this proposal has some merit. The Commission needs to determine if the current Extra written exam is the same technical level as the old Advanced exam. My understanding is the current Extra written exam is based on the Advanced written exam. If this is so, you are currently requiring the Advanced Class licensees to retest.

The fair solution to the Advanced Class licensee would be to take the remaining part of the written Extra exam. This would require two parts to the Extra written exam. This would create additional work for the VECs.

With the removal of the 20 WPM CW test for the Extra Class, the Extra Class became the Advanced Class.

The Commission needs to consider grandfathering all Advanced Class licensees into the Extra Class. This could be done during the license renewal process and not by the VECs.

Respectfully,

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